UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE CHINA MEDIAEXPRESS HOLDINGS, INC. SHAREHOLDER LITIGATION

This Document Relates to:

ALL ACTIONS

Civil Action No. 11-cv-0804 (VM)

CLASS ACTION

ECF Case Electronically Filed

THE CLASS REPRESENTATIVES' MOTION FOR FINAL APPROVAL OF SETTLEMENT

PLEASE TAKE NOTE THAT on September 18, 2015 at 9:30 a.m. in Courtroom 11B a the Daniel Patrick Moynihan United States Courthouse at 500 Pearl Street, New York, NY 10007-1312, Lead Plaintiffs Irrevocable Trust FBO Lansing Davis and the Davis Partnership LP and additional plaintiffs John Haughton, Ethan Lamar Pierce and John Shaffer (hereinafter collectively referred to as the "Class Representatives," will and hereby do move the Court, the Honorable Victor Marrero, for an Order granting the Class Representatives' Motion for Final Approval of Settlement.

This motion is based upon: i) this notice of motion; ii) the accompanying memorandum of law; iii) the Declaration of Karl P. Barth in Support of: 1) The Class Representatives' Motion for Final Approval of Settlement; and 2) Class Counsels' Request for an Award of Attorneys' Fees and Reimbursement of Expenses (and Exhibits A – G attached thereto); iv) the Declaration of Jed D. Melnick; and v) such argument and additional papers as may be submitted to the Court before and at the hearing on the motion.

Respectfully submitted, DATED: July 30, 2015

HAGENS BERMAN SOBOL SHAPIRO LLP

By <u>/s/ Karl P. Barth</u> Steve W. Berman

Karl P. Barth 1918 Eighth Avenue, Suite 3300

Seattle, WA98101

Telephone: (206) 623-7292 Facsimile: (206) 623-0594

steve@hbsslaw.com karlb@hbsslaw.com

Jason A. Zweig (JZ-8107)

HAGENS BERMAN SOBOL SHAPIRO LLP

One Penn Plaza, 36th Floor New York, NY 10119 Telephone: (212) 752-5455 Facsimile: (917) 210-3980

jasonz@hbsslaw.com

Reed R. Kathrein Peter E. Borkon

HAGENS BERMAN SOBOL SHAPIRO LLP

715 Hearst Avenue, Suite 202

Berkeley, CA94710

Telephone: (510) 725-3000 Facsimile: (510) 725-3001 reed@hbsslaw.com

peterb@hbsslaw.com

Lead Counsel for the Class

Michael Eisenkraft (ME-6974)

COHEN MILSTEIN SELLERS & TOLL PLLC

88 Pine Street, 14th Floor New York, NY 10005

Telephone: (212) 838-7797 Facsimile: (212) 838-7745

meisenkraft@cohenmilstein.com

Steven J. Toll
Julie Goldsmith Reiser
S. Douglas Bunch (SB-3028)
COHEN MILSTEIN SELLERS & TOLL PLLC
1100 New York Avenue, N.W.
West Tower, Suite 500
Washington, DC 20005-3964
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
stoll@cohenmilstein.com
jreiser@cohenmilstein.com
dbunch@cohenmilstein.com

Co-counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that I am the ECF User whose ID and password are being used to electronically file the foregoing with the Clerk of the Court using the CM/ECF system on July 30, 2015, which will send notification of such filing to the e-mail addresses registered, as denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ Karl P. Barth KARL P. BARTH Case 1:11-cv-00804-VM-GWG Document 248 Filed 07/30/15 Page 5 of 6

Mailing Information for a Case 1:11-cv-00804-VM-GWG

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

· Karl P. Barth

karlb@hbsslaw.com

· Gary Frederick Bendinger

gbendinger@sidley.com,nyefiling@sidley.com

Jeffrey A. Berens

jeff@dyerberens.com

· Steve W. Berman

steve@hbsslaw.com,carrie@hbsslaw.com,jeniphr@hbsslaw.com,nicolleg@hbsslaw.com

· Jeniphr Breckenridge

jeniphr@hbsslaw.com

· Stephen Douglas Bunch

dbunch@cohenmilstein.com,efilings@cohenmilstein.com

Donald Howard Chase

dchase@morrisoncohen.com.courtnotices@morrisoncohen.com

· Patrick Vincent Dahlstrom

pdahlstrom@pomlaw.com

• Marshall Pierce Dees

mdees@holzerlaw.com

• Michael Benjamin Eisenkraft

meisenkraft@cohenmilstein.com,efilings@cohenmilstein.com

• Robert Craig Finkel

rfinkel@wolfpopper.com,cdunleavy@wolfpopper.com,mgianfagna@wolfpopper.com,nmackiel@wolfpopper.com

· Savvas Antonios Foukas

foukas@hugheshubbard.com

· Lionel Z. Glancy

Iglancy@glancylaw.com, mmgoldberg@glancylaw.com, csadler@glancylaw.com, pbinkow@glancylaw.com, info@glancylaw.com, rprongay@glancylaw.com, prongay.glancylaw.com, prongay.glancylaw.g

· David Andrew Gordon

dgordon@sidley.com,efilingnotice@sidley.com

· Marc Ian Gross

migross@pomlaw.com

· Jonathan Richard Horne

jhorne@rosenlegal.com

· Reed Richard Kathrein

reed@hbsslaw.com,peterb@hbsslaw.com,pashad@hbsslaw.com,sf_filings@hbsslaw.com

• Phillip C. Kim

pkim@rosenlegal.com

· Eugene R. Licker

elicker@loeb.com,nydocket@loeb.com,tcummins@loeb.com

• Jeremy Alan Lieberman

jalieberman@pomlaw.com,lpvega@pomlaw.com

• William R. Maguire

maguire@hugheshubbard.com

· Michael Edward Marr

mmarr@marrlaw.com

· Kim Elaine Miller

kim.miller@ksfcounsel.com,dawn.hartman@ksfcounsel.com,kimmiller225@yahoo.com

· David S. Nalven

davidn@hbsslaw.com, Seanh@hbsslaw.com, grega@hbsslaw.com, dakotas@hbsslaw.com, dakotas.gam, dakotas.g

• Julie Goldsmith Reiser

jreiser@cohenmilstein.com

· Laurence Matthew Rosen

lrosen@rosenlegal.com

· David Avi Rosenfeld

 $drosenfeld@rgrdlaw.com, e_file_ny@rgrdlaw.com, e_file_sd@rgrdlaw.com$

· Samuel Howard Rudman

 $srudman@rgrdlaw.com, e_file_ny@rgrdlaw.com, mblasy@rgrdlaw.com, e_file_sd@rgrdlaw.com, mblasy@rgrdlaw.com, e_file_sd@rgrdlaw.com, mblasy@rgrdlaw.com, mblasy@rgrdlaw$

· Miles Norman Ruthberg

miles.ruthberg@lw.com,rachel.feld@lw.com,jessica.bengels@lw.com,elizabeth.evans@lw.com

· Gazeena Kaur Soni

gsoni@sidley.com,nyefiling@sidley.com

· Steven Jeffrey Toll

stoll@cohenmilstein.com, efilings@cohenmilstein.com

· Laura Maines Vasey

lvasey@loeb.com,nydocket@loeb.com,tcummins@loeb.com

· Michael Dana Warden

mwarden@sidley.com, cqureshi@sidley.com, nyefiling@sidley.com, lkelemen@sidley.com, dcefilingnotice@sidley.com, nyefiling@sidley.com, lkelemen@sidley.com, dcefilingnotice@sidley.com, nyefiling@sidley.com, nyefiling.com, nyefil

· Jason Allen Zweig

jasonz@hbsslaw.com,peterb@hbsslaw.com,reed@hbsslaw.com

Manual Notice List

The following is the list of attorneys who are not on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

Glancy Binkow & Goldberg, LLP (CA) 1801 Avenue of the Stars Suite 311

Los Angeles, CA 90067

Howard G. Smith

Smith & Smith 3070 Bristol Pike Bensalem, PA 19020